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Wells Fargo Advisors, LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

WELLS FARGO ADVISORS, LLC, a  
limited liability company,

Petitioner,

v.

KENNETH C. SHAFFER, an individual,

Respondent.

Case No. C11-01500 JCS

**DECLARATION OF BEVERLY  
W. JACKSON IN SUPPORT OF  
MOTION OF WELLS FARGO  
ADVISORS, LLC TO VACATE  
ARBITRATION AWARD**

**DATE:** June 3, 2011  
**TIME:** 9:30 A.M.  
**COURTROOM:** A, 15<sup>th</sup> Floor

I, BEVERLY W. JACKSON, declare as follows:

1. I hold the position of Assistant Secretary for each of the following entities: Wells Fargo Advisors, LLC ("WFA"), Wachovia Securities Financial Holdings, LLC ("WSFH"), EVEREN Capital Corporation ("EVEREN"), and Wells Fargo Investment Group, Inc. ("WFIG"). I have personal knowledge of the facts set forth herein. If called and sworn as a witness, I could and would testify under oath to the statements made herein.

2. As an Assistant Secretary of WFA, WSFH, EVEREN, and WFIG, I am responsible for maintaining the corporate minutes, corporate agreements, and

1 other corporate records for each of those entities. As a result of my position and my  
2 responsibilities, I have knowledge of the states of organization and the principal  
3 places of business of WFA, WSFH, EVEREN, and WFIG.

4 3. WFA is a limited liability company organized under the laws of  
5 the state of Delaware and has its principal place of business in St. Louis, Missouri.  
6 The majority of WFA's executive and administrative functions are performed in  
7 St. Louis, Missouri. WFA is a wholly-owned subsidiary of WSFH, a Delaware  
8 limited liability company.

9 4. WSFH is a limited liability company organized under the laws  
10 of the state of Delaware and has its principal place of business in St. Louis,  
11 Missouri. The majority of WSFH's executive and administrative functions are  
12 performed in St. Louis, Missouri. WSFH is owned seventy seven percent (77%) by  
13 EVEREN, a Delaware corporation, and twenty three percent (23%) by Wells Fargo  
14 Investment Group, Inc., a Delaware corporation.

15 5. EVEREN is incorporated under the laws of the state of  
16 Delaware and has its principal place of business in Charlotte, North Carolina. The  
17 majority of EVEREN's executive and administrative functions are performed in  
18 Charlotte, North Carolina. EVEREN is a wholly-owned subsidiary of Wells Fargo  
19 & Company.

20 6. WFIG is incorporated under the laws of the state of Delaware  
21 and has its principal place of business in Minneapolis, Minnesota. The majority of  
22 WFIG's executive and administrative functions are performed in Minneapolis,  
23 Minnesota. WFIG is a wholly-owned subsidiary of Wells Fargo & Company.

24 7. On January 1, 2011, pursuant to a written agreement, and in  
25 connection with a corporate reorganization, Wells Fargo Investments, LLC ("WFI")  
26 transferred and assigned to WFA all of its brokerage business assets and liabilities.  
27 WFA now owns those transferred assets and is now responsible for those transferred  
28 liabilities. I have reviewed the assignment agreement, and as an Assistant Secretary

1 of WFA, I am responsible for maintaining the assignment agreement on behalf of  
2 WFA.

3 I declare under penalty of perjury under the laws of the United States of  
4 America that the foregoing is true and correct.

5 Executed on April 5, 2011 in St. Louis, Missouri.

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7   
8 BEVERLY W. JACKSON  
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